

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRES SIMON-SALGADO,
a/k/a ANDRES SALGADO,
a/k/a JOHNATHAN AVILES-CARRILLO,
a/k/a RAYMOND ZUNIGA,
a/k/a RAYMOND CELSO,

Defendant.

INDICTMENT

The Grand Jury charges:

Alien Felon Reentry

On or about April 21, 2025, in Kent County, in the Western District of Michigan, Southern Division,

ANDRES SIMON-SALGADO,
a/k/a ANDRES SALGADO,
a/k/a JOHNATHAN AVILES-CARRILLO,
a/k/a RAYMOND ZUNIGA,
a/k/a RAYMOND CELSO,

being an alien who had previously been removed after having been convicted of a felony offense, was found in the United States without having obtained the express prior consent of the Attorney General or the Secretary of Homeland Security to return or reapply for admission.

8 U.S.C. § 1326(a)
8 U.S.C. § 1326(b)(1)

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
Acting United States Attorney



JONATHAN ROTH
Assistant United States Attorney